

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NELCY MABEL GARCÍA DE LEÓN, individually
and on behalf of all others similarly situated,

Plaintiff,

v.

NEW YORK UNIVERSITY,

Defendant.

Case No. 1:21-cv-5005

NOTICE OF MOTION TO DISMISS THE COMPLAINT

PLEASE TAKE NOTICE that upon the Declaration of Keara M. Gordon, dated August 27, 2021, the exhibits attached thereto, and the accompanying Memorandum of Law in Support of Defendant's Motion to Dismiss Plaintiff Nelcy Mabel García De León's Complaint ("Memorandum"), defendant New York University ("NYU"), by and through its attorneys, DLA Piper LLP (US), will move before the Honorable Colleen McMahon, United States District Judge of the United States District Court, Southern District of New York, at 500 Pearl St., New York, New York 10007, on a date and at a time designated by the Court, for an Order pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the Complaint with prejudice and without leave to amend, and for such other and further relief as the Court deems necessary and proper. The grounds upon which NYU seeks relief are set forth in detail in the accompanying Memorandum.

Dated: August 27, 2021

Respectfully submitted,

DLA PIPER, LLP (US)

By: /s/ Keara M. Gordon

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